## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RICHARD P. by and for RACHEL P. and DENISE L. by and for KRISTINA L.,	) No. 03-390 Erie )
·	) ELECTRONICALLY FILED
Plaintiffs,	) )
V •	<pre>) Jury Trial Demanded )</pre>
SCHOOL DISTRICT OF THE CITY OF ERIE, et al	)
Defendants.	)

## <u>PLAINTIFFS' MOTION FOR A TWO-DAY</u> ENLARGEMENT IN TIME TO RESPOND TO SUMMARY JUDGMENT MOTION

- 1. Plaintiffs' Response to Defendants' Summary Judgment Motion is due today. However, Plaintiffs need one additional day to complete the response. Unfortunately, Plaintiffs' counsel is due to travel to Erie tomorrow and cannot work on the brief tomorrow.
- 2. Therefore, it is necessary to request an extension until Monday, September  $26^{\rm th}$ .
- 3. Plaintiff does not believe that any prejudice will occur if this motion is granted. Plaintiffs' response till thereafter adequately address the issues raised by the Defendants.

WHEREFORE, Plaintiffs request that they be permitted to file their summary judgment brief on or before September 26, 2005.

Respectfully submitted,

s/ Edward A. Olds Edward A. Olds, Esquire Pa. I.D. No. 23601 Carolyn Spicer Russ Pa. I.D. No. 36232 Richard S. Matesic Pa. I.D. No. 72211

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Counsel for Plaintiffs

## CERTIFICATE OF SERVICE

I hereby certify that on September 22, 2005, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

S/ Edward A. Olds
Edward A. Olds, Esquire